

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE

IN RE:

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|--------------------------|-----------|----------|
| Marquita Lafaye Bradshaw | CASE NO.: | 19-28907 |
| Debtor(s) | CHAPTER | 13 |

MOTION TO INCUR ADDITIONAL DEBT

COMES NOW the Debtor, **Marquita Lafaye Bradshaw**, by and through her attorney of record, and requests that this Honorable Court enter an Order allowing the Debtor to incur additional debt up to \$15,000.00 for a new vehicle. The Debtor(s) would show that the debt is necessary for the Debtor to fund the Chapter 13 plan. Debtor had no vehicle in her name when the case was filed. If the motion to incur new debt is denied it will make it difficult for the debtor to complete a successful reorganization.

WHEREFORE, PREMISES CONSIDERED, your Debtor prays that this Court enter an Order allowing Debtor to incur the above listed new debt and setting the matter at the next available hearing date.

Respectfully Submitted,

/s/ Arthur A Byrd Jr.

Arthur A Byrd Jr (029081)
Attorney for Debtor
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Collierville, TN 38017
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Motion has been served upon all interested parties per the Creditor Matrix, via regular U.S. Mail, postage prepaid, this the June 9, 2020.

/s/ Arthur A Byrd Jr.

Arthur A Byrd Jr.